

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

ALL IN JETS, LLC,

Debtor.

Chapter 11

Case No. 20-11831 (MEW)

**AMENDED REQUEST FOR SERVICE OF DOCUMENTS AND NOTICE OF
WITHDRAWAL OF APPEARANCE AND REQUEST FOR REMOVAL FROM
COURT'S ELECTRONIC SERVICE LIST AND MAILING LISTS**

PLEASE TAKE NOTICE that CAE North East Training Inc. and CAE SimuFlite Inc. (together, “CAE”) hereby amends its *Notice of Appearance and Request for Service of Documents*, dated September 8, 2020 [Dkt. No. 23], and requests, pursuant to section 1109(b) of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), that all notices given in these cases and all papers served or required to be served on CAE in these cases be given to and served upon CAE c/o Richard R. Shiarella, Senior Legal Counsel, at the address set forth below. An e-mail address is included, and notice by e-mail is affirmatively acknowledged as being acceptable:

Richard R. Shiarella
Senior Legal Counsel
CAE North East Training Inc. and CAE SimuFlite Inc.
Northeast Training Center
4 Apollo Drive
Whippany, NJ 07981
Telephone: (973) 581-7424
Facsimile: (973) 515-0385
E-mail: richard.shiarella@cae.com

PLEASE TAKE FURTHER NOTICE that Rebecca J. Winthrop of Norton Rose Fulbright US LLP hereby withdraws her firm’s appearance in this case, and on behalf of

herself and on behalf of CAE hereby gives notice that it no longer is necessary to serve counsel at the address below, and requests that her name be removed from any and all service lists:

Rebecca J. Winthrop
NORTON ROSE FULBRIGHT US LLP
555 South Flower Street, Forty-First Floor
Los Angeles, California 90071
Telephone: (213) 892-9200
Facsimile: (213) 892-9494
E-mail: rebecca.winthrop@nortonrosefulbright.com

PLEASE TAKE FURTHER NOTICE that the requests set forth herein includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, complaint, demand, disclosure statement, plan of reorganization, or any other document that in any way affects the debtors or their property, whether transmitted or conveyed by mail delivery, telephone, facsimile, telex, or otherwise.

PLEASE TAKE FURTHER NOTICE that, this amended request for service of documents and notice of withdrawal of appearance and request for removal from all service lists is not intended as nor does it constitute a consent of CAE to the jurisdiction of the Bankruptcy Court nor, specifically, but not limited to, a waiver of (i) CAE's right to have final orders in non-core matters entered only after *de novo* review by a District Court judge; (ii) CAE's right to trial by jury in any proceeding so triable herein, or in any case, controversy or proceeding related hereto; (iii) CAE's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, set-offs, or recoupments to which CAE is or may be entitled under any

agreement, in law, or in equity, and all such rights, claims, actions, defenses, set-offs, and recoupments are expressly reserved.

Dated: New York, New York
November 25, 2020

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

By: /s/ Rebecca J. Winthrop
Rebecca J. Winthrop
555 South Flower Street, Forty-First Floor
Los Angeles, California 90071
Telephone: (213) 892-9200
Facsimile: (213) 892-9494

*Counsel to CAE North East Training Inc. and CAE
SimuFlite Inc.*

CERTIFICATE OF SERVICE

I certify that on November 25, 2020, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of New York.

/s/ Rebecca J. Winthrop

Rebecca J. Winthrop